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February 15, 2017

Via ECF

Honorable Ronnie Abrams
United States District Judge
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Jason Galanis et al*
16-cr-0371-4 (RA)

Dear Judge Abrams:

This firm represents defendant Hugh Dunkerley in the above-captioned matter. This letter/motion is respectfully submitted on behalf of Mr. Dunkerley to request a further modification of the conditions of his bond by modifying the hours during which Mr. Dunkerley may be away from his home.

On or about, November 10, 2016, Your Honor approved a modification (on consent) suspending the home confinement condition of Mr. Dunkerley's bond between the hours of 6:00 A.M. and 9:00 P.M. to allow Mr. Dunkerley to seek and obtain employment (ECF document # 95).

Mr. Dunkerley is now working as an Uber driver. To that end, Mr. Dunkerley requests a further modification that will allow him to leave and remain away from his home between 6:00 a.m. and 12:00 a.m. daily without giving prior notice to Pretrial Services so that he may continue to work as an Uber driver and so that he may work during the evening hours when he can be more productive. All other bail conditions would continue to remain in effect.

I have conferred with Officer Barrios, the supervising Pretrial Officer in the Central District of California and she takes no position with respect to this request and defers to the Court and the assigned Pretrial Officer in the Southern District of New York. I have also conferred with Officers Izlia Sanchez and John Moscato, the assigned Pretrial Officers in the Southern District of New York, and I am advised that Pretrial Services has no objection to the proposed modification. I have also conferred with AUSA Blais, who advises me that the Government does not object to this request.

In light of the above, I respectfully request Mr. Dunkerley's bond be modified so that when Mr. Dunkerley is at home in California he may leave and remain away from his home daily between the hours of 6:00 A.M. and 12:00A.M. without prior notice to Pretrial Services, but that he must be in his home from 12:00 AM. to 6:00 A.M. unless granted permission by his supervising Pretrial Officer.

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Thank you in advance for Your Honor's consideration in this matter.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Joseph Grob". The signature is fluid and cursive, with the first name "Joseph" and last name "Grob" clearly distinguishable.

Joseph A. Grob

cc: AUSA Brian Blais (via ECF & email)
Pretrial Officer Barrios (via email)
Pretrial Officers Sanchez and Moscato (via email)
Hugh Dunkerley (via email)